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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Establishment of a Federal Advisory)
Committee to Assist in the Development)
of an Electronic Filing System for the)
Common Carrier Bureau)

CC Docket No. 94-18

GTE's COMMENTS

GTE Service Corporation ("GTE") on behalf of its affiliated domestic telephone operating companies ("GTOCs") hereby submit GTE's Comments in response to the FCC's Public Notice proposing to establish a Federal Advisory Committee to assist the Common Carrier Bureau ("Bureau") in the development and implementation of an electronic filing system.¹ The proposed advisory committee would be created under the Federal Advisory Committee Act ("FACA").²

The FCC proposes to create an advisory committee to assist the Bureau in the formulation of rules and procedures for the electronic filing of Bureau applications, formal complaints, various reports, petitions, tariff filings and related pleadings and reports. The advisory committee would make recommendations to the Bureau regarding (1) designing the technical software necessary to receive, store and retrieve Bureau filings; (2) studying the feasibility of creating an on-line public access system to the database; and (3) analyzing and

¹ Public Notice FCC 94-44, dated March 7, 1994.

² 5 U.S.C. App. 2.

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identifying the costs of implementing and maintaining such a system and the feasibility of recovering such costs through user fees or other means.

SUMMARY

GTE supports the creation of an advisory committee to assist in establishing an electronic filing system for Common Carrier Bureau documents. Electronic filing would likely serve the public interest by reducing costs and increasing efficiency for the Bureau and for parties making Bureau filings. Electronic filing would also likely improve public access to Bureau records. In addition, the electronic filing system created for the Bureau could serve as the model for and an important step towards creating an electronic filing system for all Commission documents. GTE supports the advisory committee concept because it will enable companies like GTE to participate in creating the electronic filing system and to share with the Bureau experience GTE and others have in designing and implementing similar systems.

GTE believes that the scope of the advisory committee's deliberations should be expanded to include recommendations on the security, capacity, availability, and reliability of electronic filing.

GTE is willing to assist the Bureau in this important endeavor. GTE has a functioning "On-Line Tariff System" that GTE uses to store and retrieve federal and state tariff filings. GTE has also been a leader in working with the Securities and Exchange Commission in implementing its electronic filing system. Moreover, GTE has extensive experience in designing complex systems similar

to that contemplated in the Public Notice. Thus, GTE is familiar with the technical requirements and the costs associated with creating electronic filing systems. GTE's experience would be valuable to the Bureau in creating an electronic filing system for Bureau documents. GTE is interested in helping the Bureau either by serving as a member of the advisory committee, or as a subject matter expert in this area.

DISCUSSION

1. GTE supports the Commission's proposal to create an advisory committee.

GTE supports the Commission's proposal to create an advisory committee to assist the Common Carrier Bureau in creating an electronic filing system for Bureau documents. GTE believes that an electronic document filing and retrieval system would benefit the Bureau and those parties that file Bureau documents. The Bureau would benefit in many ways. Electronic filing would eliminate the storage space requirements and other costs incurred by the Bureau in receiving and storing paper filings and would enable the Bureau to manage and organize filings more efficiently. Also, Bureau staff would benefit by being able to access filings electronically. Parties filing comments would benefit by being able to file documents with the Bureau electronically from remote locations. GTE, for example, generates some Bureau filings at its Telephone Operations headquarters in Irving, Texas. An electronic filing system would allow GTE and other companies to make Bureau filings from offices located outside of Washington, D.C. In addition, because electronically filed documents

would not need to be hand delivered or mailed to the Bureau, companies everywhere would benefit by being able to make last minute changes to Bureau documents and still file them on time.

GTE also supports the proposed advisory committee because an electronic filing system would facilitate public access to documents filed with the Bureau. Remote access will make it easier for individuals, no matter where they are located, to access public Bureau records. Moreover, remote access would eliminate the costly and time consuming process of obtaining paper copies of Bureau records.

In addition, GTE endorses the proposed advisory committee insofar as the recommendations of the advisory committee would be an important step in the direction of establishing a Commission-wide electronic filing and access system. GTE believes that the benefits of electronic filing and access should extend throughout the Commission and to all parties filing Commission documents.

GTE supports the advisory committee as the vehicle by which the Bureau examines electronic filing. The advisory committee process will allow GTE and others to participate in the development of an electronic filing system. GTE has a wealth of experience in both the design and use of electronic filing systems.³ The advisory committee process will enable the Bureau to take advantage of the experience and expertise of GTE and others in developing an electronic filing

³ See Discussion Section 2, infra.

system. Moreover, participating in the development of an electronic filing system will help GTE and other parties become familiar with the electronic filing system developed so that transition to the new system will be easier.

2. The advisory committee should also consider the security, capacity, availability, and reliability of an electronic filing system.

In addition to the issues listed in the Public Notice, the advisory committee should also make recommendations to the Bureau regarding the security, capacity, availability, and reliability of an electronic filing system. Any electronic filing system implemented by the Bureau must be secure. The system must be able to ensure that confidential material filed with the Bureau remains confidential. Also, an electronic filing system must be designed with enough capacity to prevent blocking access to the system during heavy filing periods. An electronic filing system should be widely available. The system must be designed to receive filings in a wide variety of formats and protocols. Finally, such a system must be reliable in order to be effective. The advisory committee should include these issues in its deliberations and in any recommendations it makes to the Bureau.

3. GTE's experience will be valuable in developing an electronic filing system for the Common Carrier Bureau.

GTE has a wealth of experience dealing with electronic filing, storage and retrieval of information. This experience will be valuable in developing an electronic filing system for the Common Carrier Bureau. For example, GTE has a functioning "On-Line Tariff System" ("OLTS") that enables GTE to store and

retrieve all of its federal access tariffs and state tariffs.⁴ In developing this system, GTE has already addressed many of the issues that the Bureau must consider in developing its electronic filing system. Also, as a result of this experience, GTE knows first-hand the costs of developing such a system.

GTE has been at the forefront helping the Securities and Exchange Commission ("SEC") develop and implement its Electronic Data Gathering, Analysis, and Retrieval ("EDGAR") system. GTE Corporation was one of the original members of the SEC's EDGAR pilot program. As such, GTE was involved helping the SEC develop and implement EDGAR. In addition, GTE's public companies were among the first to be completely phased-in to the EDGAR system. GTE has also worked closely with the EDGAR filing support group at the SEC and has developed internal software to facilitate GTE's EDGAR filings.

In addition to the specific examples described above, GTE has extensive experience in designing complex systems similar to that being contemplated by the Bureau. GTE is familiar with designing systems that support wide-spread public use. GTE believes that its vast experience in designing and using complex electronic filing, storage, and retrieval systems will be valuable to the Bureau in designing an effective electronic filing system. GTE would like to assist the Bureau in this endeavor either as a member of the advisory committee or as a subject matter expert on electronic filing systems.

⁴ Attached as Appendix A is a general description of what OLTS is and how it works.

In summary, GTE supports the Commission's proposal to create an advisory committee to assist the Common Carrier Bureau in developing an electronic filing system. The advisory committee's deliberations should include the security, capacity, availability and reliability of electronic filing. GTE would like to share its considerable expertise in developing and using complex electronic filing systems with the Bureau either by serving on the advisory committee or as a subject matter expert available to the Bureau.

Respectfully submitted,

GTE Service Corporation and its affiliated
domestic telephone operating companies



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Chapter 2. What is OLTS?



The On-line Tariff System

OLTS, the On-line Tariff System, serves as an integrated repository for managing and tracking collaborative work on GTE and CONTEL tariffs. If you work with the filing life cycle, *OLTS* is a tool you can use to help you do your job.

By using *OLTS* from your workstation, you can:

- ◆ Access projects and filings that other GTE employees worked on
- ◆ Locate, retrieve, and modify single sheets
- ◆ Build and modify filing books
- ◆ Create addendums and supplements
- ◆ Track status changes to projects
- ◆ Sort data about projects by areas, jurisdictions, authors, filing types, and more
- ◆ Generate reports about status, revenue, and schedules, and more
- ◆ Print documents and reports
- ◆ Store any work you do with projects and filings so other employees can access your changes.

Several software products work together to provide the functions in *OLTS*. Most of the time, you will feel like you are using one product, *OLTS*. Unless you are a system administrator, you will likely be aware of one other software product:

- ◆ *TOPIC* - You'll use *TOPIC* to search for and retrieve information and documents about tariffs and filings. *TOPIC* has been customized to work with *OLTS*. *TOPIC* contains some *OLTS*-unique choices to enhance its ability to search for and retrieve the information and documents you want. *OLTS* will bring you into *TOPIC* directly from *OLTS* and will bring you out of *TOPIC* directly back into *OLTS*. You don't have to worry about when to use *TOPIC* with *OLTS*. *OLTS* takes care of that for you.

If you transfer a document out of *OLTS* to your workstation to modify it, you'll probably use *WordPerfect* or *Microsoft Word*.

The Filing Life Cycle

In GTE, the filing life cycle involves:

- ◆ Modifying documents
- ◆ Reviewing documents
- ◆ Submitting filings to a commission
- ◆ Reworking some documents
- ◆ Waiting for a commission to approve filings
- ◆ Identifying filings a commission approves
- ◆ Archiving sheets that are superseded by others
- ◆ Negating some projects.

Figure 1 on page 2-2 graphically represents the filing life cycle.

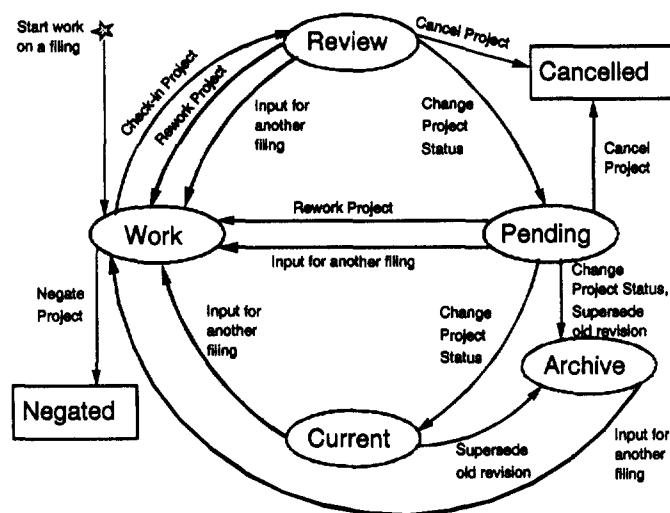


Figure 1. The Filing Life Cycle



What OLTS can do for you

Fewer Errors, Increased Productivity, and a Minimal Loss of Knowledge

OLTS can help you manage the filing life cycle through information exchange. By using *OLTS*, you can enhance information exchange, resulting in:

- ◆ Fewer errors
- ◆ Increased productivity
- ◆ A minimal loss of knowledge
- ◆ No geographic barriers
- ◆ Fewer dependencies.

For example, the minimum team for each project includes an author, an administrator, and state regulatory contact. Each person works on more than one project at a time, so each person belongs to more than one small team.

As a member of several small teams who modify tariffs, you continuously come together for a project, work on the project, and dissolve into other small teams. For the short term, when you go on vacation, become ill, or attend a class, someone outside of the original team often fills in as your backup. Over time, people who worked on the projects move into other jobs and are unavailable when the same tariff needs another update. For both the short and long term knowledge about the changes from previous team members can easily be lost.

Because *OLTS* serves as a repository, *OLTS* automatically records information about projects (dates, numbers, revenue estimates, and much more) and team members can use *OLTS* to store their own comments about projects. Later, other team members can access the information and comments in *OLTS*. In fact, if another team requires the same words you are using, they can copy your review, pending, or current documents and use your words without having to rekey them, minimizing new errors and saving their team time.

No Geographic Barriers

The people on these small teams often work in different locations. For example, the author may be in a different wing of the building from the administrator. The state regulatory contact may be in a different city or state. Without *OLTS*, teams might have to rely on FAX or express mail to review drafts, time-consuming and expensive options.

OLTS allows local and remote users access to the same information. Both local and remote users can work with that information on their own workstation. So, if state regulatory contacts want to check on the status of a project or review a draft, even if the author and administrator are located miles away, they can work with up-to-date information and know that what they have is the most current.

Fewer Dependencies

Another benefit of *OLTS* is that everyone can access information without being held up by the availability of other team members. For example, if someone on your team is at lunch, in a meeting, out ill, or on vacation, you can access information in *OLTS* to generate many reports and to sort data by many variables without having to wait for your team mate to do the work for you. You'll find this feature especially helpful if you are working before or after hours and need access to information immediately.



GTE and CONTEL Databases

When GTE and CONTEL merged, GTE acquired the tariff jurisdictions that CONTEL occupied. These jurisdictions differ from the original GTE tariff jurisdictions. For the long term, GTE plans to merge the two jurisdictions. For the short term, as an employee who works with the tariff filing process, you will work on projects that involve either the GTE jurisdictions or the CONTEL jurisdictions. Until GTE merges the jurisdictions, no single project will involve both.

OLTS maintains the information about the GTE and the CONTEL jurisdictions in separate databases. If you are working on a project that involves GTE jurisdictions, you can tell *OLTS* to use the GTE database. If you are working on a project that involves CONTEL jurisdictions, you can tell *OLTS* to use the CONTEL database.

